

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEROME L. JOHNSON,)	
)	
Plaintiff,)	No. 1:19-cv-00698
)	
v.)	
)	Honorable Ellen L. Hollander
BALTIMORE POLICE DEPARTMENT, <i>et al.</i>)	
)	
Defendants.)	

DEFENDANTS' MOTION FOR LEAVE TO AMEND EXHIBIT

Defendants, Kevin Davis, Frank Barlow, Daniel Boone, Gerald Goldstein, and the Baltimore Police Department (“Defendants”), respectfully move this Court to amend exhibit 26 to ECF 137 (ECF 137-26), Defendants’ Motion to Dismiss Plaintiff’s Amended Complaint as a Litigation Sanction Based on the Use of False or Fabricated Evidence (“Motion to Dismiss”). In support thereof, Defendants state as follows:

1. In support of their Motion to Dismiss, Defendants requested that the Court seal one exhibit: Plaintiff’s Second Supplemental Answers to Defendant Davis’s First Set of Interrogatories, ECF 137-26. *See* ECF 144.
2. On June 1, 2022, the Court issued an Order denying the parties’ respective sealing motions, including Defendants’ request to seal ECF 137-26. *See* ECF 168.
3. Upon further consideration, Defendants recognize that the Second Supplemental Answers did not need to be attached in their entirety. The Motion to Dismiss only cited certain pages of the Second Supplemental Answers, none of which include sensitive information.
4. Defendants request leave to amend ECF 137-26 to only include the pages of Plaintiff’s Second Supplemental Answers cited in Defendants’ Motion to Dismiss—specifically

pages 10-11, 16, 20, and 35 of the Answers. Defendants' proposed amended exhibit is attached as Exhibit A.

5. Defendants have consulted with Plaintiff's counsel regarding this issue. Plaintiff's counsel does not oppose this request.

6. Defendants make no further requests that the other documents addressed in the Court's June 1 Order, ECF 168, remain under seal.

WHEREFORE, Defendants request that the Court grant their request to amend ECF 137-26, to include the pages appearing in Exhibit A to this Motion.

Dated: June 22, 2022

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that I have caused true and correct copies of the above and foregoing to be served on all counsel of record via the Court's CM/ECF system, in accordance with the rules of electronic filing of documents, on June 22, 2022.

Respectfully Submitted,

/s/
Shneur Nathan